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**WATCH TOWER BIBLE AND TRACT**  
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**Attorney for Plaintiff**

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

In Re DMCA Subpoena to Facebook, Inc.	X Case No. <u>7:18-mc-00362</u> : : <b>Declaration of Paul D. Polidoro in</b> : <b>Support of Watch Tower Bible</b> : <b>and Tract Society's Request to the</b> : <b>Clerk for Issuance of Subpoena to</b> : <b>Facebook, Inc, Pursuant to 17</b> : <b>U.S.C. § 512(h) to Identify Alleged</b> : <b>Infringers</b> X
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I, Paul D. Polidoro, counsel of record for Petitioner, Watch Tower Bible and Tract Society of Pennsylvania (hereinafter "Watch Tower"), in the above-referenced matter, hereby declare as follows:

1. I am authorized to act on behalf of Watch Tower.
2. I submit this declaration in support of Watch Tower's request for issuance of a subpoena to Facebook, Inc., pursuant to the Digital Millennium Copyright Act (DMCA) 17 U.S.C. § 512(h) (hereinafter "DMCA Subpoena"), to identify the Instagram user(s) and account "jw\_kevin."
3. Pursuant to 17 U.S.C. § 512 (c)(3)(A), Watch Tower submitted a notification to Instagram, Inc. a product of Facebook, Inc., identifying the infringing content posted on the their Instagram website and provided the information required by 17

U.S.C. § 512 (c)(3)(A). True and accurate copies of the submitted notifications are attached hereto as **Exhibit 1**.

4. The purpose for which this DMCA Subpoena is sought is to obtain the identity of an alleged infringer and such information will only be used for the purpose of protecting Watch Tower's rights under title 17 U.S.C. §§ 100, *et. seq.*

I declare under penalty of perjury under the laws of the State of New York and United States of America that the foregoing is true and correct. Executed this 6th day of August 2018.



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